

1 Yolanda Huang (State Bar No. 104543)
2 LAW OFFICES OF YOLANDA HUANG
3 2748 Adeline Street, Suite A
4 Berkeley, California 94705
5 Telephone: (510) 329-2140
6 Facsimile: (510) 580-9410
7 E-Mail: yhuang.law@gmail.com

8 Thomas E. Nanney (State Bar No. 214342)
9 Law Office of Thomas E. Nanney
10 2217 W. 120th St.
11 Leawood, Kansas 66209
12 Telephone: (816) 401-0047
13 Email: tomanney@gmail.com

14 Richard A. Brody, Esq. (State Bar No. 100379)
15 1206 Beattie Lane
16 Sebastopol, CA 95472
17 Telephone: (707) 235-6982
18 Facsimile: (707) 235-6982
19 Email: rick@brodylaw.com

20 Attorney for Plaintiffs

21 IN THE UNITED STATES DISTRICT COURT
22 FOR THE NORTHERN DISTRICT OF CALIFORNIA

23 SAN FRANCISCO/OAKLAND DIVISION

24 **ALAMEDA COUNTY MALE PRISONERS**
25 And Former Prisoners, DANIEL GONZALEZ,
26 et al. on behalf of themselves and others
27 similarly situated, as a Class, and Subclass
28 **PLAINTIFFS,**

29 vs.

30 **ALAMEDA COUNTY SHERIFF'S**
31 **OFFICE, et al**

32 **DEFENDANTS.**

33 No. 3:19-cv-07423 JSC

34 **DECLARATION OF YOLANDA**
35 **HUANG IN SUPPORT OF**
36 **OPPOSITION TO DEFENDANTS'**
37 **REQUEST FOR DEPOSITION OF**
38 **MICHAEL LOCKHART, REQUEST**
39 **FOR RECONSIDERATION**

40 LOC.: 450 Golden Gate Ave.,
41 San Francisco, CA 94102
42 DEPT.: Courtroom 8, 19th Floor

43 Hon. Jacqueline S. Corley, Presiding

1 I, Yolanda Huang declare:

2 1. I am one of the counsels for plaintiffs in this matter.

3 2. To date, defendants have noticed and taken 11 depositions, including:

5 1. Tiara Arnold
6 2. L. Gerrans
7 3. D. Gonzalez
8 4. C..Henry
9 5. J. Mallet
10 6. D. Misch
11 7. T. Phillips
12 8. E. Rivera
13 9. T. Upshaw
14 10. E. Wayne
15 11. K. Moule

16 3. On September 28, 2023, the parties had a meet and confer regarding deposition scheduling. The
17 matter of Rule 30(a) and the 10 deposition limit arose. Counsel for County defendants stated she
18 would object to any plaintiffs' depositions beyond the statutory limit.

19 4. Thereafter I circulated an email requesting dates and times to meet and confer on this matter. I
20 confirmed that the deposition of Michael Lockhart would number deposition 12. In addition,
21 defendants are demanding a 13th deposition, that of Randy Harris. To date, none of the defense
22 counsels have responded.

23 I make this declaration under penalty of perjury under the laws of the State of California,
24 executed this 29th day of September, 2023 in Berkeley, California.

26 /s/ *Yolanda Huang*
27 Yolanda Huang